



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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AS:LKG  
F. #2019R1646

271 Cadman Plaza East  
Brooklyn, New York 11201

November 23, 2020

**BY ECF AND EMAIL**

The Honorable Roslynn R. Mauskopf, Chief Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

The Honorable Margo K. Brodie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

The Honorable Frederic Block  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Yinghang Yang  
Criminal Docket No. 20-531 (MKB)

Dear Chief Judge Mauskopf and Judges Brodie and Block:

Pursuant to Local Rule 50.3.2, the government hereby respectfully requests that the Honorable Roslynn R. Mauskopf as Chief Judge reassign the above-referenced criminal case (the “Yang criminal case”) from the Honorable Margo K. Brodie to the Honorable Frederic Block because it is related to a civil enforcement action filed on September 21, 2020 by the Securities and Exchange Commission, Securities Exchange Commission v. Yang et al, Civ. No. 20-4427 (FB) (the “Yang civil action”). The defendant Yinghang Yang is a named defendant in the Yang civil action, and the Yang civil action involves the same transactions and events described in the Information that will be filed against Yang in the Yang criminal case. On behalf of the defendant Yang, Edward Sapone, Esq., consents to the government’s application.

Local Rule 50.4 permits the reassignment of a case “in the interests of justice and the efficient disposition of the business of court.” Here, reassignment of the Yang criminal case

to Judge Block, to whom the Yang civil action is assigned, would best serve the interests of justice and lead to significant savings of judicial resources. The insider trading scheme at issue in the Yang criminal case includes the same insider trading law violations generally described in the Yang civil action. Specifically, Yang will be charged in an Information which describes an insider trading scheme whereby Yang executed securities transactions in a co-conspirator's brokerage account based, in whole or in part, on material nonpublic information obtained by Yang in the course of his employment at the Company, a publicly traded corporation that specialized in financial information and analytics, in or about and between April 2019 and October 2019. The Yang civil action involves the same allegations.

Because the civil and criminal cases both involve the same insider trading scheme, the government respectfully submits that reassignment of the Yang criminal case to Judge Block would be appropriate, as it would likely serve the interests of justice and result in significant savings of judicial resources.

Respectfully submitted,

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Acting United States Attorney

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cc: Edward Sapone, Esq. (via electronic mail)